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Attorneys for Interested Party
Cal-Am Properties, Inc.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

Danielle Lee Wait

Debtor.

Case No. 15-33254-rld7

STIPULATION OF EXHIBITS FOR
EVIDENTIARY HEARING

The Chapter 7 Trustee, Debtor and Cal-Am Properties, Inc. (collectively, the "Parties") hereby stipulate to the authenticity and admissibility of the documents listed below and attached hereto for purposes of the hearing on the Trustee's Motion and Notice of Intent to Settle and Compromise (ECF No. 42) and the Debtor's Motion to Convert to Chapter 13 (ECF No. 45), currently set on July 26, 2016 at 1:30 p.m. in Courtroom 3; *provided, however*, that Exhibits 14-19 shall remain subject to Debtor's right to object to such exhibits on the grounds of materiality or relevance and subject to the right of either Party to introduce further evidence not inconsistent herewith.

Ex. No.	Date	Description	Offered	Objected	Received
1.	8/25/15	BOLI Litigation: Formal Charges filed by the Oregon Bureau of Labor and Industries ("BOLI") on behalf of Danielle Wait (the "Debtor"), and Amy Tuttle, and the Fair Housing Council of Oregon (Case Nos. 30-15, 31-15, and 32-15) (the " BOLI Litigation ")			
2.	10/6/15	BOLI Litigation: Petition to Intervene by Danielle Wait			
3.	1/27/16	BOLI Litigation: Petition in Intervention by Danielle Wait			
4.	4/27/16	BOLI Litigation: Respondent's Motion for Summary Judgment			
5.	5/13/16	BOLI Litigation: Complainants' Opposition to Respondent's First Motion for Summary Judgment			
6.	5/13/16	BOLI Litigation: Amended Formal Charges			
7.	5/16/16	BOLI Litigation: Agency's Response to Respondent's First Motion for Summary Judgment			
8.	5/27/16	BOLI Litigation: Reply in Support of Respondent's Motion for Summary Judgment			
9.	6/3/16	BOLI Litigation: Agency's Response to Respondent's Reply in Support of Motion for Summary Judgment			
10.	6/22/16	BOLI Litigation: Interim Order Re Respondent's Motion for Summary Judgment			

Ex. No.	Date	Description	Offered	Objected	Received
11.	5/3/16	<i>Appeal:</i> Cal-Am Litigation: Petitioner-Appellant's Opening Brief and Excerpt of Record filed in the Cal-Am Properties v. Oregon Bureau of Labor and Industries case in the Cal-Am Properties vs. Oregon Bureau of labor and Industries, Court of Appeals for the State of Oregon Case No. CA A161504 (" Cal-Am Litigation ")			
12.	6/20/16	<i>Appeal:</i> Cal-Am Litigation: Respondent's Answering Brief			
13.	7/11/16	<i>Appeal:</i> Cal-Am Litigation: Petitioner-Appellant's Reply Brief			
14.	5/12/15	Letter Springbrook Estates to Debtor Residence and All Other Occupants Re: Account Balance Owed \$60.60			
15.	9/8/15	Notice of Termination for Non-Payment of Rent to Debtor Residence and All Other Occupants			
16.	11/24/15	Letter Cal-Am Properties / Springbrook Estates to Debtor Residence and All Occupants Re: Ninety-Day Notice of Rent Increase			
17.	4/8/16	Notice of Termination for Non-Payment of Rent to Debtor Residence and All Other Occupants			

Ex. No.	Date	Description	Offered	Objected	Received
18.	6/10/16	Notice of Termination for Non-Payment of Rent to Debtor Residence and All Other Occupants			
19.	7/20/16	Resident Ledger at Debtor Residence			
20.	6/22/16	Paystub Date: ACNM, LLC Employer; Danielle L. Wait, Employee			
21.	7/06/16	Paystub Date: ACNM, LLC Employer; Danielle L. Wait, Employee			
22.	7/20/16	Paystub Date: ACNM, LLC Employer; Danielle L. Wait, Employee			

So Stipulated:

Perkins Coie LLP

/s/ Douglas R. Pahl
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Attorneys for Cal-Am Properties, Inc.

Dated: July 26, 2016

Motschenbacher & Blattner, LLP

/s/ Troy Sexton
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Dated: July 16, 2016

1 /s/ Rodolfo Camacho
2 Rodolfo A. Camacho, OSB No. 95520
3 Chapter 7 Bankruptcy Trustee
4 rudy@camacholaw.com
5 PO Box 13897 Salem, OR 97309
6 Telephone: (503) 244-4810
7 *Chapter 7 Trustee*

Dated: July 26, 2016

8 Presented by:

9 **Perkins Coie LLP**

10 /s/ Douglas R. Pahl
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16 *Attorneys for Cal-Am Properties, Inc.*

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on the date show below the foregoing
3 STIPULATION OF EXHIBITS FOR EVIDENTIARY HEARING was electronically filed with
4 the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all
5 CM/ECF participants.
6

7 DATED this 26th day of July, 2016

8 PERKINS COIE LLP

9 /s/ Douglas R. Pahl

10 Douglas R. Pahl, OSB No. 950476
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11 Attorneys for Cal-Am Properties, Inc.
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